

Motion to object to certification of compliance filed by debtor.

Virginia Eastern Bankruptcy court

701 east broad street

Eastern District VA

Richmond

VA 23219

Judge Keith Philips Room #5100 Case 16-30731-klp

RICHMOND DIVISION	
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FEB 24 2021	
CLERK	
U.S. BANKRUPTCY COURT	

This is a Motion to object to debtors request re certification of compliance of bankruptcy. I also want to raise up the fact that I was again not informed of this motion by the debtor, even though the last time I was not informed the judge stated that I was also to be informed by email.

Reasons for objection

1 The creditor objects to the debtor's statement that all payments have been made, as untrue. The creditors have not been paid out the required minimum 27% as required by the current plan. Also the debtor was meant to return the bond of \$5216 to the trustee as extra money if it was returned to the debtor, per the judges verbal instructions in I think 2018.

2 The creditor objects to the debtors statement #6 as untrue.

*"6. If applicable, I/we certify that as of the date of this certification that I/we have paid all amounts due under any domestic support obligation [as that term is defined in 11 U.S.C. §101(14A)] required by a judicial or administrative order, or by statute, including amounts due either (i) before this bankruptcy case was filed and provided for in the Plan, or (ii) due any time after the filing of this bankruptcy case."*

The debtor is in arrears on child support medical payments due since November 2018 and there is pending litigation against the debtor in court at this time that the debtor is totally aware off as she has already asked for a continuance to the trial date.

3 The creditor objects to the debtors statement #4 as untrue.

*"4. I/We did not have, either at the time of filing this bankruptcy or at the present time, equity in excess \$146,450 if the case was filed on or after April 1, 2010, in the type of property described in 11 U.S.C. §522(p)(1) [generally the debtor's homestead]. that the debtor does not have assets of more than \$146450 at the time of there filing."*

I believe the debtor is again undervaluing the property and the assets of the debtor are more than the \$146,450 stated.

Also the debtors statement says their "motion is true under the penalty of perjury", I file for a penalty.

Regards



Laurie Pearce (Creditor)

23 Feb 2021

a copy has been emailed to the party on  
24 Feb 2021

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re: Colleen Higgins  
9601 ~~Individual~~ Debtor(s)  
Clysterfield  
VA

**Plaintiff(s)**

Case No. 16-30731-k1p  
Chapter 13

Adversary Proceeding No.

1

Defendant(s)

**CERTIFICATION UNDER LOCAL BANKRUPTCY RULE 2090-1**

Document Title: Motion to object to Certification of Compliance  
Date Document Filed: 24 Feb 2021  
Docket Entry No.

I declare under penalty of perjury that (Check one box):

No attorney has prepared or assisted in the preparation of this document.  
 The following attorney prepared or assisted in the preparation of this document.

(Name of Attorney)

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(Address of Attorney)

(Telephone Number of Attorney)

LAURIE PEARCE  
Name of Pro Se Party (Print or Type)

Name of Pro Se Party (Print or Type)

**Signature of Pro Se Party**

**Signature of Pro Se Party**

Executed on: 24 Feb 2021 (Date)